

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MICHELLE BEEBE,

Plaintiff,

v.

Civil Action No. 05-30182

WILLIAMS COLLEGE,

Defendant.

**INITIAL DISCLOSURES PURSUANT TO LOCAL RULE 26.2(A)
AND FED. R. CIV. P. 26(A)(1)**

Pursuant to Local Rule 26.2(A) and Fed. R. Civ. P. 26(a)(1), Defendant Williams College (“Williams”) makes the following initial disclosures with respect to the corresponding subparts of Fed. R. Civ. P. 26(a)(1):

(A) The persons known or believed to have discoverable information relevant to disputed facts alleged in the pleadings, based upon the information reasonably available to Williams and its attorneys at this time, are the following:

- Michelle Beebe
509 North Houghton Street
Clarksburg, MA 01247

Subjects: Plaintiff's claims.

- Marc Field
Custodian
Service Building
Williams College
60 Latham Street
Williamstown, MA 02167
(413) 597-2293

Subjects: Plaintiff's termination and grievance.

- Michael L. Gerrity, M.D.
Ambulatory Care Center
77 Hospital Avenue, Suite 102
North Adams, MA 01247
(413) 663-8365

Subjects: Medical condition of Plaintiff's children.

- Carol Luscier
Snack Bar Manager
Droppers House
Williams College
15 Park Street
Williamstown, MA 01267
(413) 597-3487

Subject: Plaintiff's attendance.

- Kris Maloney
Benefits Administrator
B&L Building
Williams College
100 Spring Street, Suite 201
Williamston, MA 01267
(413) 597-4478

Subject: Williams' policies and Plaintiff's FMLA claim.

- Carol Marks
Science Library Assistant
Sawyer Library
Williams College
55 Sawyer Library Drive
Williamstown, MA 01267
(413) 597-4502

Subjects: Plaintiff's termination and grievance.

- Peter Mason
Supervisor of Custodial Services
Service Building

Williams College
60 Latham Street
Williamstown, MA 01267
(413) 597-2293

Subjects: Plaintiff's attendance and termination.

- Beatrice Miles
Director of Facilities Services
Service Building
Williams College
60 Latham Street
Williamstown, MA 01267
(413) 597-3496

Subjects: Plaintiff's attendance, termination, and FMLA claim.

- Stephen Payne, M.D.
Northern Berkshire Family Practice
820 State Road
North Adams, MA 01247
(413) 664-4088

Subjects: Plaintiff's medical condition.

- Damon Reed
Senior Development Officer
Vogt House
Williams College
75 Park Street
Williamstown, MA 01267
(413) 597-4122

Subjects: Plaintiff's termination and grievance.

- Martha Tetrault
Director of Human Resources
B&L Building
Williams College
100 Spring Street, Suite 201
Williamstown, MA 01267
(413) 597-2058

Subjects: Williams' policies and Plaintiff's FMLA claim, termination and grievance.

(B) The documents described below constitute the documents within the scope of Fed. R. Civ. P. 26(a)(1)(B) that Williams is able to identify at this time. Copies of these documents are located at the B&L Building, Williams College, 100 Spring Street, Suite 201, Williamstown, MA 02167.

- Williams' employment policies and forms
Location: Human Resources Department
- Plaintiff's personnel records
Location: Human Resources Department
- Plaintiff's attendance and payroll records
Location: Human Resources Department

(C) As Williams is a defendant in this action, Fed. R. Civ. P. 26(a)(1)(C) is not applicable.

(D) Williams is insured by United Educators for an amount that would be sufficient to cover an amount that Plaintiff could potentially recover.

Respectfully submitted,
Williams College
By its attorneys,

/s/ Patricia M. Higgins

Judith A. Malone (BBO #316260)
Patricia M. Higgins (BBO # 663318)
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Dated: August 30, 2006

CERTIFICATE OF SERVICE

I hereby certify that this document has been filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Patricia M. Higgins